

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CommScope, Inc.; CommScope, Inc.  
of North Carolina; and CommScope  
Technologies LLC,

Plaintiffs,

V.

Rosenberger Technology (Kunshan) Co. Ltd., Rosenberger Asia Pacific Electronic Co., Ltd., Rosenberger Technology LLC, Rosenberger USA Corp., Rosenberger North America Pennsauken, Inc., Rosenberger Site Solutions, LLC, Rosenberger Hochfrequenztechnik GmbH & Co. KG, Northwest Instrument, Inc., and CellMax Technologies AB

## Defendants.

) Civil Action No. 19-cv-15962-JXN-  
) LDW

**DECLARATION OF ROY LIU  
IN SUPPORT OF  
MOTION TO SEAL**

I, ROY LIU, hereby declare as follows:

1. I am counsel for Rosenberger Technology (Kunshan) Co. Ltd. (“Rosenberger Kunshan”), Rosenberger Asia Pacific Electronic Co., Ltd. (“Rosenberger Asia Pacific”), and Rosenberger Technology LLC (“Rosenberger Technology”) (collectively, “Rosenberger”) in the above-captioned matter.

2. I make this Declaration in support of the Motion to Seal in accordance with Local Civil Rules 5.3(c)(3) and 7.2 (the “Motion”) in connection with CommScope Inc.’s (“CommScope”) Motion to Compel Production of

Rosenberger's Design Files and certain exhibits thereto (ECF No. 490) and Rosenberger's Opposition to CommScope's Motion to Compel and certain exhibits thereto (ECF No. 495) (collectively, the "Motion to Compel Submissions").

3. The documents identified in the Consolidated Index submitted herewith should be maintained under seal on the Court's docket because they contain confidential and non-public information regarding Rosenberger's business operations. Based upon my own knowledge, public disclosure of this information could cause clearly defined, serious, and unnecessary harm to Rosenberger. Specifically, the redacted portions of the Motion to Compel Submissions are narrowly tailored to statements that disclose information contained in discovery materials that have been designated Confidential or Attorneys' Eyes Only by the propounding party. These statements concern confidential information about Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's strategic business decisions and base station antenna design and development processes. These statements also contain confidential and personally and commercially sensitive information about Rosenberger's employees.

4. In addition to the limited redactions of the Motion to Compel Submissions, Rosenberger requests that the designated exhibits of the Motion to Compel Submissions (the "Exhibits") remain under seal in their entirety. As detailed

in the Consolidated Index, most of the Exhibits are discovery materials that have been designated as Confidential or Attorneys' Eyes Only by the propounding party. Moreover, the designated Exhibits contain sensitive material that contains confidential information pertaining to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's strategic business decisions and base station antenna design and development processes, and confidential and sensitive information about Rosenberger's employees.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 10<sup>th</sup>, 2022.

  
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Roy Liu